

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

IN RE:	)	CHAPTER 11
	)	
ATLANTA LIGHT BULBS, INC.,	)	CASE NO.: 22-52950-PMB
	)	
<u>Debtor.</u>	)	

**NOTICE OF FILING SECOND DECLARATION OF KATHLEEN G. FURR**

COMES NOW, Kathleen G. Furr, as co-counsel for the Official Committee of Unsecured Creditors of Atlanta Light Bulbs, Inc., and files this Notice of Filing Second Declaration of Kathleen G. Furr as a supplement to the Application for Order Authorizing and Approving Employment of Baker, Donelson, Bearman, Caldwell & Berkowitz, P.C. as Co-Counsel for the Official Committee of Unsecured Creditors of Atlanta Light Bulbs, Inc., Nunc Pro Tunc to June 10, 2022 of the Official Committee of Unsecured Creditors [Docket No. 50] filed on June 13, 2022. Attached hereto as **EXHIBIT A** is the Second Declaration of Kathleen G. Furr dated June 22, 2022. Attached hereto as **EXHIBIT B** is a red line comparing the Declaration of Kathleen G. Furr dated June 12, 2022 with the Second Declaration of Kathleen G. Furr dated June 22, 2022.

Dated: June 22, 2022

Respectfully submitted,

THE OFFICIAL COMMITTEE OF UNSECURED  
CREDITORS OF ATLANTA LIGHT BULBS, INC.

By: /s/Kathleen G. Furr

Kathleen G. Furr (GA Bar No. 589008)

BAKER DONELSON BEARMAN CALDWELL &  
BERKOWITZ, PC

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*Co-Counsel for the Official Committee of  
Unsecured Creditors of Atlanta Light Bulbs, Inc.*

**CERTIFICATE OF SERVICE**

This is to certify that on June 22, 2022, I electronically filed the foregoing *Notice of Filing Second Declaration of Kathleen G. Furr* with the Clerk of Court using the CM/ECF system, which automatically sent e-mail notifications of such filing to the below listed attorneys of record:

Thomas Dworschak  
Office of the U. S. Trustee  
75 Ted Turner Drive, SW, Room 362  
Atlanta, GA 30303

Ronald A. Levine  
Levine & Block, LLC  
P.O. Box 422148  
Atlanta, GA 30342

Scott B. McMahan  
Poole Huffman, LLC  
Building J, Suite 200  
3562 Habersham at Northlake  
Tucker, GA 30084

Michael D. Robl  
Robl Law Group LLC  
Suite 250  
3754 LaVista Road  
Tucker, GA 30084

Todd J Poole  
3562 Habersham at Northlake  
Building J, Ste 200  
Tucker, GA 30084

Leslie M. Pineyro  
Jones and Walden, LLC  
699 Piedmont Avenue NE  
Atlanta, GA 30308

Todd H. Surden  
Hartman Simons & Wood  
400 Interstate North Parkway SE  
Suite 600  
Atlanta, GA 30339

Kristen A. Yadlosky  
Hartman Simons & Wood  
400 Interstate North Parkway SE  
Suite 600  
Atlanta, GA 30339

Henry F. Sewell, Jr., Esq.  
Law Offices of Henry F. Sewell, Jr., LLC  
2964 Peachtree Road, Suite 555  
Atlanta, GA 30305

S. Gregory Hays, CTP, CIRA  
Chapter 11 Trustee  
Managing Principal  
Hays Financial Consulting, LLC  
2964 Peachtree Road, Suite 555  
Atlanta, GA 30305-2153

and on the below parties via USPS with proper postage affixed:

Atlanta Light Bulbs, Inc.  
2109 Mountain Industrial Blvd  
Tucker, GA 30084

American Express Travel Related Services  
Co., Inc.  
c/o Zwicker and Associates, P.C.  
Attorneys/Agents for Creditor  
P.O. Box 9043  
Andover, MA 01810-1041

Bryan Kaplan  
6065 Roswell Road, Suite 540  
Atlanta, GA 30328

CBC Lighting Inc.  
Kaplan Legal Services, LLC  
6065 Roswell Road, Suite 540  
Atlanta, GA 30328

Hatch Transformers, Inc., d/b/a Hatch  
Lighting  
c/o Simpson, Uchitel & Wilson, LLP  
P.O BOX 550105  
Atlanta, GA 303055-2505

Worldwide Specialty Lamp, LLC  
c/o Bryan Kaplan, Esq.  
6065 Roswell Road, Suite 540  
Atlanta, GA 30328

Halco Lighting Technologies, LLC  
2940 Pacific Drive  
Norcross, GA 30071

Candela Corporation  
5600 Argosay Ave, Suite 300  
Huntington Beach, CA 92649

Norcross Electric Supply Company  
4190 Capital View Drive  
Suwanee, GA 30024

Energetic Lighting, Inc., a division of  
Yankon Ind  
540 North Golden Circle Drive  
Suite 203  
Santa Ana, CA 92705

By: /s/Kathleen G. Furr  
Kathleen G. Furr (GA Bar No. 589008)

# **EXHIBIT A**

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

IN RE:	)	CHAPTER 11
	)	
ATLANTA LIGHT BULBS, INC.,	)	CASE NO.: 22-52950-PMB
	)	
<u>Debtor.</u>	)	

**SECOND DECLARATION OF KATHLEEN G. FURR**

I, KATHLEEN G. FURR, hereby state and declare as follows:

1. I am over 21 years of age.
2. I am filing this Second Declaration of Kathleen G. Furr as a supplement to the *Application for Order Authorizing and Approving Employment of Baker, Donelson, Bearman, Caldwell & Berkowitz, P.C. as Co-Counsel for the Official Committee of Unsecured Creditors of Atlanta Light Bulbs, Inc., Nunc Pro Tunc to June 10, 2022* (the “*Application*”) of the Official Committee of Unsecured Creditors (the “*Committee*”) [Docket No. 50] filed on June 13, 2022 seeking to retain and employ as its co-counsel in the above-captioned chapter 11 case pursuant to sections 328(a) and 1103 of the United States Code (the “*Bankruptcy Code*”) and Rule 2014 of the Federal Rules of Bankruptcy Procedure (the “*Bankruptcy Rules*”), *nunc pro tunc* to June 10, 2022.
3. Baker, Donelson, Bearman, Caldwell & Berkowitz, P.C. (“Baker Donelson”) has completed a formal conflicts check for (a) each known creditor; (b) the Debtor and its equity holders; (c) all professionals employed in the chapter 11 cases; (d) the Debtor’s secured lender, and (e) all persons employed in the Office of the United States Trustee (Region 21).

4. To the best of my knowledge, information, and belief, Baker Donelson has had no connection, except as disclosed herein, with the Debtor, its creditors, the United States Trustee, any employee of the Office of the United States Trustee, the Bankruptcy Judge presiding in this case, or any party in interest, except that Baker Donelson may have appeared from time to time in the past, and may appear in the future, in other cases or matters in which one or more of such parties may have been or may be involved.

5. Neither I, nor Baker Donelson, nor any shareholder or associate thereof, insofar as I have been able to ascertain (a) hold or represent any interest adverse to the Committee or the estate; (b) represent a creditor of the same class as any member of the Committee in connection with this case, or (c) represent any other entity in connection with this case having an interest adverse to the Committee with the following exceptions:

- a. Baker Donelson represented the three petitioning creditors as Georgia counsel in this matter for the purpose of filing the involuntary bankruptcy petition against the Debtor. There is no statutory prohibition against representing creditors and the Committee in a bankruptcy case. However, any individual representation of the three petitioning creditors has ended with the formation of a Committee.
- b. Baker Donelson presently represents Ford Motor Credit, LLC in other, unrelated matters, primarily in Mississippi. If a conflict should arise in the future as between the Committee and Ford Motor Credit, LLC, then Baker Donelson cannot act as local counsel with regard to that discrete issue.
- c. Baker Donelson also presently represents American Express Travel Related Services Company, Inc. as special outside tax counsel to address

certain tax and other matters regarding American Express Travel Related Services Company, Inc.'s frequent flyer program.

6. Further, insofar as I have been able to ascertain, other than in connection with its representation of the Committee in this case, Baker Donelson has no connection (connection being defined as a biological or contractual relationship) with the Debtor, its creditors, or other parties in interest or their respective attorneys or accountants, the United States Trustee or any person employed in the office of the United States Trustee.

7. Baker Donelson makes the following general and specific disclosures:

- Baker Donelson attorneys may have represented creditors in this case at previous firms in matters wholly unrelated to the chapter 11 cases. However, given the lack of information from the Debtor, any extent of this is currently unknown. Baker Donelson will continue to perform conflicts checks as the case continues.
- As noted above, I represented the three petitioning creditors solely to file this case as an involuntary bankruptcy case. That representation has ceased since the formation of the Committee.
- As noted above, Baker Donelson represents Ford Motor Credit, LLC in other, unrelated matters, primarily in Mississippi. If a conflict should arise in the future as between the Committee and Ford Motor Credit, LLC, then Baker Donelson cannot act as local counsel with regard to that discrete issue.
- As noted above, Baker Donelson also presently represents American Express Travel Related Services Company, Inc. as special outside tax counsel to address certain tax and other matters regarding frequent flyer program.
- Some of Baker Donelson's professionals, in connection with their current employment, or before joining Baker Donelson, may have been engaged in cases, proceedings, and transactions involving, or were colleagues of, certain professionals, some of whom may have represented claimants and parties in interest in the Debtor's case.

- Baker Donelson will continue to run expanded conflicts searches as further information about the Debtor's creditors is uncovered.

8. I believe that (i) Baker Donelson is disinterested as that term is defined in Section 101 (14) of the Bankruptcy Code, and (ii) Baker Donelson does not represent any interest materially adverse to the interests of the Debtor's estate or any class of creditors or equity security holders thereof.

9. Baker Donelson has not shared or agreed to share (a) any compensation it has received or may receive in connection with these cases with another party or person, other than with the partners, of counsel, associates, contract attorneys, and law clerks associated with Baker Donelson; or (b) any compensation another person or party has received or may receive in connection with these cases.

10. Baker Donelson reserves its right to supplement this declaration should it appear that Baker Donelson has a relationship with any of the foregoing parties or additional parties in interest in this case if that interest is material or would impact Baker Donelson's disinterestedness.

11. The disclosures set forth herein are based on our initial review of the pleadings filed in this case and will be supplemented, if necessary, upon completion of a formal conflict analysis.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 22, 2022  
Atlanta, Georgia

/s/ Kathleen G. Furr  
Kathleen G. Furr

## **EXHIBIT B**

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

IN RE: ) CHAPTER 11  
)  
ATLANTA LIGHT BULBS, INC., ) CASE NO.: 22-52950-PMB  
)  
Debtor. )

**SECOND DECLARATION OF KATHLEEN G. FURR**

I, KATHLEEN G. FURR, hereby state and declare as follows:

1. I am over 21 years of age. ~~I am a shareholder in the law firm of Baker, Donelson, Bearman, Caldwell & Berkowitz, P.C. (“Baker Donelson”), which has offices at, among others, 3414 Peachtree Road, N.E., Suite 1500, Atlanta, Georgia 30326. I am a member in good standing of the Bar of the State of Georgia and am admitted to practice before the United States Court of Appeals for the Eleventh Circuit and the United States District Courts for the Northern, Middle, and Southern Districts of Georgia. There are no disciplinary proceedings pending against me.~~

2. ~~1.~~ I am ~~in all respects competent to make this declaration in support of filing this~~ Second Declaration of Kathleen G. Furr as a supplement to the *Application for Order Authorizing and Approving Employment of Baker, Donelson, Bearman, Caldwell & Berkowitz, P.C. as Co-Counsel for the Official Committee of Unsecured Creditors of Atlanta Light Bulbs, Inc., Nunc Pro Tunc to June 10, 2022* (the “*Application*”) of the Official Committee of Unsecured Creditors (the “*Committee*”) [Docket No. 50] filed on June 13, 2022 seeking to retain and employ as its co-counsel in the above-captioned chapter 11 case pursuant to sections 328(a) and 1103 of the United States Code (the “*Bankruptcy Code*”) and Rule 2014 of the Federal Rules of Bankruptcy Procedure (the “*Bankruptcy Rules*”), *nunc pro tunc* to June 10, 2022.

~~2. In connection with these cases, the Committee has requested authority to retain and employ Baker Donelson as the Committee’s co-counsel. The Committee seeks to retain Baker~~

~~Donelson, subject to the oversight and orders of the Court, to advise the Committee with respect to certain matters, including, in part, the following:~~

- ~~(a) advising the Committee on all legal issues as they arise;~~
- ~~(b) representing and advising the Committee regarding the terms of any sales of assets or plans of reorganization or liquidation, and assisting the Committee in negotiations with the Debtors and other parties;~~
- ~~(c) investigating the Debtor's assets and pre-bankruptcy conduct;~~
- ~~(d) analyzing the liens, claims and security interests of any of the Debtors' secured creditors, and where appropriate, raising challenges on behalf of the Committee;~~
- ~~(e) preparing, on behalf of the Committee, all necessary pleadings, reports, and other papers;~~
- ~~(f) representing and advising the Committee in all proceedings in this case;~~
- ~~(g) assisting and advising the Committee in its administration; and~~
- ~~(h) providing such other services as are customarily provided by counsel to a creditors' committee in cases of this kind.~~

~~3. — Baker Donelson is qualified to serve as co-counsel for the Committee. Prior to private practice, I clerked for the then Chief Judge J. Craig Whitley for the United States Bankruptcy Court for the Western District of North Carolina for two (2) years. Thereafter, I clerked for Judge Wendy L. Hagenau for one (1) year with United States Bankruptcy Court for the Northern District of Georgia. After my clerkships concluded, I joined Baker Donelson and have practice bankruptcy and work outs for more than eleven (11) years.~~

~~4. Baker Donelson requests that all legal fees and related costs incurred by the Committee on account of services rendered by Baker Donelson in this case be paid as administrative expenses of the Debtor's estate in accordance with the Bankruptcy Code and applicable orders entered in this case.~~

~~5. Baker Donelson will charge for its legal services on an hourly basis, billed in tenths of an hour increments, in accordance with its hourly rates in effect on the date that such services are rendered. Baker Donelson's current billing rates for attorneys range from \$360 per hour for bankruptcy associates to \$735.00 per hour for senior bankruptcy shareholders; however, my billing rate is currently set at \$545 per hour. Time devoted by paraprofessionals currently ranges from approximately \$160.00 to \$270.00 per hour. These hourly rates are typically subject to periodic adjustments to reflect economic and other conditions.<sup>†</sup>~~

~~6. The names, position, and hourly rates through January 31, 2022 for the Baker Donelson professionals expected to be primarily responsible for providing services to the Committee as co-counsel include: Kathleen G. Furr Shareholder (\$545/hour), Tim Colletti Associate (\$370/hour), and Locke Waldrop Associate (\$360/hour). In addition, from time to time, it may be necessary for other Baker Donelson professionals to provide services to the Committee.~~

~~7. Baker Donelson will charge for identifiable, non-overhead expenses incurred in connection with the chapter 11 case, which would not have been incurred except for representation of the Committee, in accordance with the guidelines of the United States Trustee. Baker Donelson charges only the amount actually incurred by Baker Donelson in connection with such items. Examples of such expenses are postage, overnight mail, courier delivery, photocopying, meals,~~

~~travel expenses, and lodging. Baker Donelson will maintain detailed records of any actual and necessary costs incurred in connection with the aforementioned legal services.~~

~~8. Baker Donelson intends to apply to the Court for allowance of such compensation and reimbursement of expenses in accordance with the applicable provisions of the Bankruptcy Code, the Bankruptcy Rules, the Local Rules and applicable orders of this Court, and the guidelines, practices, and customs of the United States Trustee. Baker Donelson has advised the Committee that Baker Donelson may seek interim compensation during these cases as permitted by applicable sections of the Bankruptcy Code including sections 330 and 331, the applicable Local Rules and applicable orders of this Court, including the Court's interim compensation procedures order which permits Committee professionals to file monthly interim fee statements.~~

3. ~~9. Baker Donelson is in the process of completing~~Baker, Donelson, Bearman, Caldwell & Berkowitz, P.C. ("Baker Donelson") has completed a formal conflicts ~~search~~check for (a) each known creditor; (b) the Debtor and its equity holders; (c) all professionals employed in the chapter 11 cases; (d) the Debtor's secured lender, and (e) all persons employed in the Office of the United States Trustee (Region 21).

4. ~~10.~~ To the best of my knowledge, information, and belief, Baker Donelson has had no connection, except as disclosed herein, with the Debtor, its creditors, the United States Trustee, any employee of the Office of the United States Trustee, the Bankruptcy Judge presiding in this case, or any party in interest, except that Baker Donelson may have appeared from time to time in the past, and may appear in the future, in other cases or matters in which one or more of such parties may have been or may be involved.

5. ~~11.~~ Neither I, nor Baker Donelson, nor any shareholder or associate thereof, insofar as I have been able to ascertain (a) hold or represent any interest adverse to the Committee or the

estate; (b) represent a creditor of the same class as any member of the Committee in connection with this case, or (c) represent any other entity in connection with this case having an interest adverse to the Committee with the following ~~exception:~~ Exceptions:

- a. Baker Donelson represented the three petitioning creditors as Georgia counsel in this matter for the purpose of filing the involuntary bankruptcy petition against the Debtor. There is no statutory prohibition against representing creditors and the Committee in a bankruptcy case. However, any individual representation of the three petitioning creditors has ended with the formation of a Committee.
- b. Baker Donelson presently represents Ford Motor Credit, LLC in other, unrelated matters, primarily in Mississippi. If a conflict should arise in the future as between the Committee and Ford Motor Credit, LLC, then Baker Donelson cannot act as local counsel with regard to that discrete issue.
- c. Baker Donelson also presently represents American Express Travel Related Services Company, Inc. as special outside tax counsel to address certain tax and other matters regarding American Express Travel Related Services Company, Inc.'s frequent flyer program.

6. Further, insofar as I have been able to ascertain, other than in connection with its representation of the Committee in this case, Baker Donelson has no connection (connection being defined as a biological or contractual relationship) with the Debtor, its creditors, or other parties in interest or their respective attorneys or accountants, the United States Trustee or any person employed in the office of the United States Trustee.

7. ~~12.~~ Baker Donelson makes the following general and specific disclosures:

- Baker Donelson attorneys may have represented creditors in this case at previous firms in matters wholly unrelated to the chapter 11 cases. However, given the lack of information from the Debtor, any extent of this is currently unknown. Baker Donelson will continue to perform conflicts checks as the case continues.
- As noted above, I represented the three petitioning creditors solely to file this case as an involuntary bankruptcy case. That representation has ceased since the formation of the Committee.
- As noted above, Baker Donelson represents Ford Motor Credit, LLC in other, unrelated matters, primarily in Mississippi. If a conflict should arise in the future as between the Committee and Ford Motor Credit, LLC, then Baker Donelson cannot act as local counsel with regard to that discrete issue.
- As noted above, Baker Donelson also presently represents American Express Travel Related Services Company, Inc. as special outside tax counsel to address certain tax and other matters regarding frequent flyer program.
- Some of Baker Donelson's professionals, in connection with their current employment, or before joining Baker Donelson, may have been engaged in cases, proceedings, and transactions involving, or were colleagues of, certain professionals, some of whom may have represented claimants and parties in interest in the Debtor's case.
- ~~A formal conflict check is in process.~~
- Baker Donelson will continue to run expanded conflicts searches as further information about the Debtor's creditors is uncovered.

8. ~~13.~~ I believe that (i) Baker Donelson is disinterested as that term is defined in Section 101 (14) of the Bankruptcy Code, and (ii) Baker Donelson does not represent any interest materially adverse to the interests of the Debtor's estate or any class of creditors or equity security holders thereof.

9. ~~14.~~ Baker Donelson has not shared or agreed to share (a) any compensation it has received or may receive in connection with these cases with another party or person, other than with the partners, of counsel, associates, contract attorneys, and law clerks associated with Baker Donelson; or (b) any compensation another person or party has received or may receive in connection with these cases.

10. ~~15.~~ Baker Donelson reserves its right to supplement this declaration should it appear that Baker Donelson has a relationship with any of the foregoing parties or additional parties in interest in this case if that interest is material or would impact Baker Donelson's disinterestedness.

11. ~~16.~~ The disclosures set forth herein are based on our initial review of the pleadings filed in this case and will be supplemented, if necessary, upon completion of a formal conflict analysis.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on June ~~12~~22, 2022  
Atlanta, Georgia  
Kathleen G. Furr

\_\_\_\_\_  
\_\_\_\_\_  
/s/

Kathleen G. Furr

~~EXHIBIT A~~

Document comparison by Workshare Compare on Wednesday, June 22, 2022  
7:13:07 AM

<b>Input:</b>	
Document 1 ID	netdocuments://4893-9559-0949/1
Description	ALB - Affidavit of Katy Furr for Retention Application for Committee
Document 2 ID	netdocuments://4895-0033-1557/1
Description	ALB - Second Affidavit of Katy Furr for Retention Application for Committee
Rendering set	Standard

<b>Legend:</b>	
<u>Insertion</u>	
<del>Deletion</del>	
Moved from	
<u>Moved to</u>	
Style change	
Format change	
<del>Moved deletion</del>	
Inserted cell	
Deleted cell	
Moved cell	
Split/Merged cell	
Padding cell	

<b>Statistics:</b>	
	Count
Insertions	28
Deletions	53
Moved from	1
Moved to	1
Style changes	0
Format changes	0
Total changes	83

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~~<sup>†</sup>\_\_\_\_\_The rates charged by each Baker Donelson professional differ based on, among other things, the geographic location of the office in which such professional is resident, such professional's level of experience, and the rates normally charged by similar professionals.~~